ROMIC
ENVIRONMENTAL
TECHNOLOGIES CORP.

14344 SE Industrial Way, Bldg C, Clackamas, Oregon 97015 • Phone 503.785.0404, Fax 503.786.7877

October 23, 2006

Ms. Lydia Eng
Compliance Investigator
King Co. Industrial Waste Program
130 Nickerson Street,
Suite 200, Seattle, WA 98109-1658

Dear Lydia,

Thank you for your assistance with the Alaskan Copper Slug/Discharge Plan submittal process. It was enjoyable to work with you.

I have been asked by Alaskan Copper and Brass Co. to request an addendum to the existing industrial waste discharge permit to include a 3 new wastestreams proposed for introduction in process and before pre-treatment. I have reviewed the MSDS on the new wastestreams to determine what, if any impact these may have to the Alaskan Copper pre-treatment process or to the industrial wastewater discharge.

Based on the amount, type and percent of contaminates of concern along with estimated volumes to be introduced to the existing pre-treatment operation I believe there would be no impact to the existing pre-treated discharge or existing limits.

Waste Stream Information

1. Magnaflux Brand Spot-check Penetrant SKL-WP (Isobutene Aerosol Spray)

Contains petroleum based paraffin's and pol(oxy-1,2-ethanediyl-nonylphenyl-hydroxy, along with lesser degree of ethoxylated nonylphenol
Estimated amount introduced to pre-treatment process is less (1%) in 55 gallons water per day

2. Magnaflux Brand Cleaner/Remover SKC-S (Carbon dioxide Aerosol Spray)

Contains light aliphatic solvent naphtha
Estimated amount introduced to pre-treatment process is less (1%) in 55 gallons water per day

3. Magnaflux Brand Developer SKD-S2 (Isobutene Aerosol Spray)

Contains 2-propanol and 2-propanone
Estimated amount introduced to pre-treatment process is less (1%) in 55 gallons water per day

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Impact to Pre-treatment Operations

These waste streams are generated at end point of ink marking and spotting on stainless steel pipe followed by a water rinse. Most if not all of the volatile constituents would be driven off during spraying or once introduced into the normally liquid acidic environment of the process sump. There is no incompatibility or vapor release concern due to the high rinse water dilution factor.

Most if not all of the petroleum paraffin and naphtha based oils would be coagulated during phase 1 and 2 settling as floatable solids.

Waste water from this process and containing very low levels of petroleum based paraffin and naphtha introduced into the pre-treatment process sump would congeal during settling and precipitation.

Solids would be decanted directly to the filter press operation resulting as part of the solid filter cake waste sent to EPA disposal/recycling.

Alaskan Copper and Brass would like to begin generating these three new waste streams at the earliest opportunity.

I have attached copies of the MSDS for each of the three waste streams.

Again, I stress that the volumes involved for all three are minute and may not require notification. It is our policy to advise King County of ANY change or modification to our wastestream discharge permit, or waste streams generated by our processes.

Please let me know if you need any additional information regarding this request. I look forward to receiving your response, comments, or suggestions at your earliest opportunity.

Please send all written or e-mail correspondence to;

Matthew Dunn
Agent for Alaskan Copper and Brass
cc ROMIC Environmental Technologies
14344 SE Industrial Way
Clackamas, Oregon 97015

Sincerely,

Matthew Dunn

MAGNAFLUX®

A Division of Illinois Tool Works Inc.

MATERIAL SAFETY DATA SHEET

SPOTCHECK® PENETRANT SKL-WP

1. IDENTIFICATION

Company: MAGNAFLUX
Address: 3624 West Lake Avenue, Glenview, Illinois 60026
Telephone No.: 847-657-5300 (Off-Hour Emergency Number - CHEMTREC - 1-800-424-9300).
Product Use: Visible inspection penetrant.
Packages: 1 gallon and 5 gallon pails, 55 gallon drums, aerosols.
NFPA Rating: Health 1, Flammability 1, (Aerosol Flammability 4), Reactivity 0
PIN (Canada): None
Revision Date: October 26, 2004

2. COMPOSITION/INFORMATION ON INGREDIENTS

Ingredient	*Wt./Wt. %*	*CAS #*	*TLV*	*PEL*	*LD_{50}*	*LC_{50}*
Paraffins (petroleum), normal $C_5 - C_{20}$	30 – 60	64771-72-8	Not avail.	Not avail.	Not avail.	Not avail.
Pol(oxy-1,2-ethanediyl-_-nonylphenyl-_-hydroxy	30 – 60	9016-45-9	Not avail.	Not avail.	2g/kg (oral/rat)	Not avail
Heavy aromatic solvent naphtha	0.5 – 1.5	64742-94-5	Not avail.	Not avail.	1.8g/kg (oral/rat)	Not avail.
Ethoxylated Nonylphenol	10 – 20	68412-54-4	Not avail.	Not avail.	Not avail.	Not avail.
Isobutane (propellent – aerosol only)	30	75-28-5	Not avail.	1000 ppm	Not avail	Not avail.

3. HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

Bland, oily liquid which may irritate the skin and eyes. Bulk material is difficult to ignite, but will burn vigorously if engulfed in fire. Aerosol is extremely flammable.

POTENTIAL HEALTH EFFECTS

Skin Contact: Can irritate by removing natural skin oils on long or repeated exposures.
Eyes: Irritating.
Inhalation: Not significant at room temperatures. When heated or sprayed, vapors may cause dizziness and nausea.
Ingestion: Not significant in small (mouthful) amounts.
Medical conditions known to be aggravated by exposure to product: None

4. FIRST AID

Skin Contact: Wash off with soap and water. Use soothing lotion.
Eyes: Rinse carefully under upper and lower eyelids using plenty of water.
Inhalation: Remove to fresh air if dizzy or nauseated.
Ingestion: Do not induce vomiting. Accidental ingestion of a small mouthful is not expected to cause significant harm.
NOTE: In all severe cases, contact physician immediately. Local telephone operators can furnish number of regional poison control center.

5. FIRE HAZARD

Conditions of flammability: Aerosol: Spraying near an ignition source will ignite spray mist.
Bulk: None unless heated over 200°F (93°C) near ignition source.
Flash point: Min. 200°F (93°C) (Pensky-Martens closed cup)
Flammable limits in air: 1% to 6%
Extinguishing media: Carbon dioxide, foam
Special fire fighting procedures: Keep containers cool with water spray. Do not spray water directly on burning SKL-WP. It may float and spread the fire.
Hazardous combustion products: Smoke, soot, oxides of carbon and nitrogen
Unusual fire hazards: Aerosol cans may burst at temperatures over 130°F (54°C) and spray contents into a fire.

6. ACCIDENTAL RELEASE MEASURES

Mop up or sweep up with absorbent. (For disposal, see Section 13).

7. HANDLING AND STORAGE

Store away from heat source. Avoid eye contact. Avoid repeated or prolonged skin contact.
Avoid breathing spray mist. Do not spray around arcs or flames.

8. **EXPOSURE CONTROLS/PERSONAL PROTECTION**

Controls:	None, unless sprayed. Use where ventilation will carry spray mist away from occupied areas.
Personal protection:	Wear safety glasses to protect eyes. Wear nitrile rubber gloves if hand exposure is unavoidable. Respirator with filter if sprayed in enclosed unventilated space.

9. **PHYSICAL PROPERTIES**

Initial boiling point (bulk):	Min. 455°F(235°C)(ASTM D-86)	*Vapor pressure:*	Aerosol: 60psi @75°F (24°C) Bulk: <0.10mm @ 70°F (21°C)
Percent volatile:	None (30% in aerosol)	*Vapor density:*	Heavier than air
Density/sp. gravity:	0.89	*Evaporation rate:*	Negligible
Water solubility:	0 (emulsifies into water)	*Appearance:*	Dark red oily liquid
pH:	Neutral	*Odor:*	Mild oily odor

10. **STABILITY AND REACTIVITY**

Stability:	Stable
Incompatibility:	None
Hazardous decomposition products:	Soot, oxides of carbon and nitrogen when burning
Reactivity:	None

11. **TOXICOLOGICAL INFORMATION**

Carcinogenicity:	Contains no known or suspected carcinogens listed with OSHA, IARC, NTP, or ACGIH.
Threshold limit value:	5 mg/m; for oily mist
WHMIS information (Canada):	According to available information, the ingredients have not been found to show reproductive toxicity, teratogenicity, mutagenicity, skin sensitization, or synergistic toxic effects with other materials.

12. **ECOLOGICAL INFORMATION**

No data is available on SKL-WP. It emulsifies into water and is biodegradable. Its low bulk vapor pressure may exempt it from VOC restrictions. The hydrocarbon propellant is not an ozone depleter.

13. **DISPOSAL**

As a non-hazardous oily waste, incinerate or send to waste handler who can blend it into secondary fuels. Empty aerosol cans before disposal.

RCRA:	Not a hazardous waste
U.S. EPA Waste Number:	None

14. **TRANSPORTATION**

U.S. DOT: 49 CFR 172.101 Hazardous Materials Table

	Non-Aerosol	Aerosol
Proper shipping name:	None, not restricted	Consumer commodity
Hazard class or division:	None	ORM-D
Identification No.:	None	None
Packing Group:	None	None

IATA: List of Dangerous Goods	Non-Aerosol	Aerosol
Proper shipping name:	None, not restricted	Aerosols, flammable
Hazard class or division:	None	2.1
Identification No.:	None	UN1950
Packing Group:	None	-

IMDG: General Index	Non-Aerosol	Aerosol
Proper shipping name:	None, not restricted	AEROSOLS
Hazard class or division:	None	2.1
Identification No.:	None	UN1950
Packing Group:	None	-

15. **REGULATORY INFORMATION**

TSCA:	All ingredients are listed in TSCA inventory.
CERCLA:	Not reportable
SARA TITLE III, Section 313:	No reportable ingredients
California Proposition 65:	This product contains trace amount of chemicals known to the State of California to cause cancer and to cause birth defects or other reproductive harm.
WHMIS Class (Canada):	Non-Aerosol: D-2B Aerosol: A, B-5, D-2B

Note: This MSDS has been prepared to meet WHMIS (Canada) requirements with the exception of using 16 headings.

16. **OTHER INFORMATION**

Revision Statement:	Section 2, 14, 15
Supersedes:	October 26, 2001
Prepared by:	Tamie Simmons, R&D Manager

3624 WEST LAKE AVENUE GLENVIEW, ILLINOIS 60026 TEL (847) 657-5300 FAX (847) 657-5388

www.magnaflux.com

MAGNAFLUX®

A Division of Illinois Tool Works Inc.

MATERIAL SAFETY DATA SHEET

SPOTCHECK® CLEANER/REMOVER SKC-S

1. **IDENTIFICATION**

Company:	MAGNAFLUX
Address:	3624 West Lake Avenue, Glenview, Illinois 60026
Telephone No.:	847-657-5300 (Off-Hour Emergency Number - CHEMTREC - 1-800-424-9300).
Product Use:	Wipe on solvent cleaner/remover for penetrant inspection
Packages:	1 gallon can, 5 gallon pail, 55 gallon drums, aerosols
NFPA Rating:	Health 1, Flammability 3, Reactivity 0
PIN (Canada):	Bulk: UN1268
Revision Date:	October 26, 2004

2. **HAZARDOUS INGREDIENTS**

Ingredient	*Wt./Wt. %*	*CAS #*	*TLV*	*PEL*	*LD_{50}*	*LC_{50}*
Light aliphatic solvent naphtha	60-100	64742-89-8	300ppm (8 hr.TWA)	not avail.	5 g/kg (oral/rat)	3400 ppm (4hrs/rat)
Carbon dioxide propellant (Aerosol Only)	3-7	124-38-9	not avail.	5000 ppm	not avail.	not avail.

3. **HAZARDS IDENTIFICATION**

EMERGENCY OVERVIEW

Flammable liquid and aerosol. Vapor may cause flash fire. Harmful or fatal if swallowed. Mist or vapor may irritate the respiratory tract. Liquid contact may cause eye and skin irritation. Over-exposure may cause central nervous system (CNS) depression and target organ effects. Spills may create a slipping hazard.

POTENTIAL HEALTH EFFECTS & SIGNS AND SYMPTOMS OF EXPOSURE:

Skin Contact: Irritating to skin. Repeated exposure may cause skin dryness or cracking.
Eyes: Vapors may be irritating to the eye.
Inhalation: Vapors expected to be slightly irritating. Vapors may cause drowsiness and dizziness.
Ingestion: Harmful: may cause lung damage if swallowed.
Medical conditions known to be aggravated by exposure to product: Pre-existing medical conditions of the following organ(s) or organ system(s) may be aggravated by exposure to this material: Eyes, Skin, Respiratory system.

4. **FIRST AID**

Skin Contact: Wash off with soap and water. Use soothing lotion.
Eyes: Rinse carefully under upper and lower eyelids using plenty of water. Rest eyes for 30 minutes. If redness, burning, blurred vision, or swelling persist, transport to the nearest medical facility for additional treatment.
Inhalation: Remove to fresh air if dizzy or nauseated. If rapid recovery does not occur, transport to nearest medical facility for additional treatment.
Ingestion: Do not induce vomiting. Transport to nearest medical facility for additional treatment. If vomiting occurs spontaneously, keep head below hips to prevent aspiration.

NOTE: In all severe cases, contact physician immediately. Local telephone operators can furnish number of regional poison control center.

5. **FIRE HAZARD**

Conditions of flammability: Bulk and aerosol: Readily ignited in presence of ignition sources.
Flash point: Min. 57°F (14°C) (Pensky-Martens) closed cup.
Flammable limits in air: 1% to 6%.
Extinguishing media: Carbon dioxide, foam
Special fire fighting procedures: Keep containers cool with water spray. Do not spray water directly on burning SKC-S. It will float and spread the fire.
Hazardous combustion products: Smoke, soot, oxides of carbon.
Unusual fire hazards: Aerosol cans may burst if heated above 130°F (54°C) and spray contents into a fire.

6. **ACCIDENTAL RELEASE MEASURES**

Mop up or sweep up with absorbent. Avoid contact with spilled or released material. Immediately remove all contaminated clothing. (For disposal, see Section 13.)

7. **HANDLING AND STORAGE**

Avoid eye contact. Avoid repeated or prolonged skin contact. Avoid breathing spray mist. Do not spray near arcs or flames. Use only in well ventilated areas. Wash thoroughly after handling.

8. **EXPOSURE CONTROLS/PERSONAL PROTECTION**

Controls: Use where ventilation will carry spray mist away from occupied areas.

Personal protection: Wear safety glasses to protect eyes. Wear nitrile rubber gloves if hand exposure is unavoidable. Respirator with solvent vapor absorbing cartridge if used in enclosed, unventilated space.

9. **PHYSICAL PROPERTIES**

Initial boiling point (bulk):	Min. 245°F (118°C) (ASTM D-86)	*Vapor pressure:*	12 and 16 oz.Aerosol: 105psi @ 75°F(24°C) Bulk: 1.5 – 2.0 kPa at 20°C/68.0°F
Percent volatile:	99.9 (EPA Method 24)	*Vapor density:*	4.1
Density/sp. gravity: 0.76	*Evaporation rate:*	Fast	
Water solubility:	0	*Appearance:*	Clear, colorless liquid
pH:	Neutral	*Odor:*	Naphtha odor
VOC	100%		

10. **STABILITY AND REACTIVITY**

Stability: Stable under normal conditions of use

Incompatibility: Avoid heat, sparks, open flames and other ignition sources. Avoid strong oxidizing agents.

Hazardous decomposition products: A complex mixture of airborne solids, liquids, and gases, including carbon monoxide, carbon dioxide and other organic compounds will be evolved when this material undergoes combustion or thermal or oxidative degradation.

Reactivity: None

11. **TOXICOLOGICAL INFORMATION**

Carcinogenicity: Contains no known or suspected carcinogens listed with OSHA, IARC, NTP, or ACGIH.

Threshold limit value: 300 ppm

WHMIS information (Canada): According to available information, the ingredients have not been found to show reproductive toxicity, teratogenicity, mutagenicity, skin sensitization, or synergistic toxic effects with other materials.

12. **ECOLOGICAL INFORMATION**

No data is available on SKC-S. It floats on water and evaporates away. It is 100% VOC.

13. **DISPOSAL**

As hazardous waste, send to licensed waste handler who can blend it into secondary fuels.

RCRA: Hazardous waste.

U.S. EPA Waste Number: D001

14. **TRANSPORTATION**

U.S. DOT: 49 CFR 172.101 Hazardous Materials Table

	Non-Aerosol	Aerosol
Proper shipping name:	Petroleum distillates, n.o.s.	Consumer Commodity
Hazard class or division:	3	ORM-D
Identification No.:	UN1268	None
Packing Group:	II	None

IATA: List of Dangerous Goods	Non-Aerosol	Aerosol
Proper shipping name:	Petroleum distillates, n.o.s.	Aerosols, flammable
Hazard class or division:	3	2.1
Identification No.:	UN1268	UN1950
Packing Group:	II	-

IMDG: General Index	Non-Aerosol	Aerosol
Proper shipping name:	PETROLEUM DISTILLATES,N.O.S.	AEROSOLS
Hazard class of division:	3.2	2.1
Identification No.:	UN1268	UN1950
Packing Group:	II	-

14. **REGULATORY INFORMATION**

TSCA: All ingredients are listed in TSCA inventory.

Canadian DSL: All ingredients are listed in the Canadian DSL

CERCLA: VM&P Naphtha (64742-89-8) Reportable Quantity 66,667 lbs.

SARA TITLE III, Section 313: Xylene, Mixed Isomer (1330-20-7) <0.13%; meta-Xylene (108-38-3)< 0.05%; Ethylbenzene (100-41-4)< 0.03%; Benzene (71-43-2) <0.005%; Toluene (108-88-3) <0.01%

California Proposition 65: Warning: This material may contain trace amounts of chemicals known to the state of California to cause cancer and/or birth defects and/or reproductive harm.

WHMIS Class (Canada): Non-Aerosol: B-2, D-2B; Aerosol: A, B-5, D-2B

Note: This MSDS has been prepared to meet WHMIS (Canada) requirements with the exception of using 16 headings.

15. **OTHER INFORMATION**

Revision Statement: Updated all sections

Supersedes: April 22, 2002

Prepared by: Tamie Simmons, Research Manager

3624 WEST LAKE AVENUE GLENVIEW, ILLINOIS 60026 TEL (847) 657-5300 FAX (847) 657-5388

www.magnaflux.com

MAGNAFLUX®

A Division of Illinois Tool Works Inc.

MATERIAL SAFETY DATA SHEET

SPOTCHECK® DEVELOPER SKD-S2

1. IDENTIFICATION

Company: MAGNAFLUX
Address: 3624 West Lake Avenue, Glenview, Illinois 60026
Telephone No.: 847-657-5300 (Off-Hour Emergency Number - CHEMTREC - 1-800-424-9300).
Product Use: Penetrant inspection developer
Packages: 1 gallon can, 5 gallon pail, 55 gallon drum, aerosol
NFPA Rating: Health 1, Flammability 3, (aerosol 4), Reactivity 0
PIN (Canada): UN 1993
Revision Date: October 26, 2004

2. COMPOSITION/INFORMATION ON INGREDIENTS

Ingredient	Wt./Wt.%	CAS#	TLV	PEL	LD_{50}	LC_{50}
2-propanol	40 – 70	67-63-0	400 ppm	400 ppm	3.6 g/kg(oral/mouse	Not available
2-propanone	10 – 30	67-64-1	750 ppm	750 ppm	6 g/kg (oral/rat)	Not available
Isobutane (propellent – aerosol only)	30	75-28-5	Not available	1000 ppm	Not available	Not available
Talc	1 - 3	14807-96-6	Not available	2 mg/me	Not available	Not available

3. HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

Extremely flammable white liquid and aerosol. Fast evaporating vapors can reach hazardous levels quickly in unventilated spaces.

POTENTIAL HEALTH EFFECTS & SIGNS AND SYMPTOMS OF EXPOSURE:

Skin Contact: Can irritate by removing natural skin oils on long or repeated exposures.
Eyes: Irritating, but does not damage eye tissue.
Inhalation: Causes dizziness and nausea.
Ingestion: Not significant in small (mouthful) amounts.
Medical conditions known to be aggravated by exposure to product: None

4. FIRST AID

Skin Contact: Remove contaminated clothing. Wash exposed areas with soap and water. Use soothing lotion.
Eyes: Rinse carefully under upper and lower eyelids using plenty of water.
Inhalation: Remove to fresh air if dizzy or nauseated.
Ingestion: Do not induce vomiting. Accidental ingestion of a single mouthful is not expected to cause significant harm.
NOTE: In all severe cases, contact physician immediately. Local telephone operators can furnish number of regional poison control center.

5. FIRE HAZARD

Conditions of flammability: Non-aerosol and aerosol: Ignition will occur if used near flames, arcs or other ignition sources.
Flash point: 2°F (-16°C) (Pensky-Martens closed cup).
Flammable limits in air: 2% to 15%.
Extinguishing media: Carbon dioxide, foam, water.
Special fire fighting procedures: Keep containers cool with water spray.
Hazardous combustion products: Soot, oxides of carbon.
Unusual fire hazards: Aerosol cans may burst over 130°F (54°C) and add to existing fire.

6. ACCIDENTAL RELEASE MEASURES

Turn off or remove sources of ignition. Mop up or sweep up with absorbent. (For disposal, see Section 13.)

7. HANDLING AND STORAGE

Avoid breathing vapors. Avoid eye contact. Avoid repeated or prolonged skin contact.
Store away from heat source. Do not spray around arcs or flame.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Controls: Use where ventilation will carry vapors away from occupied areas.
Personal protection : Wear safety glasses to protect eyes. Wear nitrile rubber gloves if hand exposure is unavoidable. Respirator with filter if sprayed in enclosed, unventilated space.

PHYSICAL PROPERTIES

Initial boiling point (bulk):	132° F (55°C) (ASTM D-86)	*Vapor pressure:*	Bulk: 150mm @ 100°F (38°C). Aerosol: 65 psi @ 75°F (24°C)
Percent volatile:	90%	*Vapor density:*	3
Density/sp. gravity:	0.87	*Evaporation rate:*	0.4 of ether
Water solubility:	90	*Appearance:*	White liquid
pH:	Neutral	*Odor:*	Alcohol odor

10. **STABILITY AND REACTIVITY**

Stability:	Stable
Incompatibility:	None
Hazardous decomposition products:	When burning, soot, oxides of carbon
Reactivity:	None

11. **TOXICOLOGICAL INFORMATION**

Carcinogenicity:	Contains no known or suspected carcinogens listed with OSHA, IARC, NTP, or ACGIH.
Threshold limit value (Bulk):	400 ppm
WHMIS information (Canada):	According to available information, the ingredients have not been found to show reproductive toxicity, teratogenicity, mutagenicity, skin sensitization, or synergistic toxic effects with other materials.

12. **ECOLOGICAL INFORMATION**

No data is available on SKD-S2.

13. **DISPOSAL**

Send to a licensed waste facility for proper disposal.

RCRA:	Hazardous waste.
U.S. EPA Waste Number:	D001

14. **TRANSPORTATION (These are guidelines, in all cases refer to 49 CFR for proper classification)**

U.S. DOT: 49 CFR 172.101 Hazardous Materials Table

	Non-Aerosol	Aerosol
Proper shipping name:	Flammable Liquid, n.o.s. (Isopropanol, acetone)	Consumer commodity
Hazard class or division:	3	ORM-D
Identification No.:	UN1993	None
Packing Group:	II	None

IATA: List of Dangerous Goods	Non-aerosol	Aerosol
Proper shipping name:	Flammable liquid, n.o.s. (Isopropanol, Acetone)	Aerosols, flammable
Hazard class or division:	3	2.1
Identification No.:	UN1993	UN1950
Packing Group:	II	-

IMDG: General Index	Non-aerosol	Aerosol
Proper shipping name:	FLAMMABLE LIQUID, N.O.S. (ISOPROPANOL, ACETONE)	AEROSOLS
Hazard class or division:	3.2	2.1
Identification No.:	UN1993	UN1950
Packing Group:	II	-

15. **REGULATORY INFORMATION**

TSCA:	All ingredients are listed in TSCA inventory.
CERCLA:	Reportable quantity (RQ) for Acetone = 5000 lbs.
SARA TITLE III, Section 313:	Acetone.
California Proposition 65:	This product contains trace amount of chemicals known to the State of California to cause cancer and to cause birth defects or other reproductive harm.
WHMIS Class (Canada):	Non-Aerosol: B-2, D-2B - Aerosol: A, B-5, D-2B

Note: This MSDS has been prepared to meet WHMIS (Canada) requirements with the exception of using 16 headings.

16. **OTHER INFORMATION**

Revision Statement:	2, 14, 15
Supersedes:	MSDS dated 10/26/01

Prepared by: Tamie Simmons, R&D Manager

3624 WEST LAKE AVENUE GLENVIEW, ILLINOIS 60026 TEL (847) 657-5300 FAX (847) 657-5388

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October 16, 2006

Ms Lydia Eng
Investigator
Industrial Waste Program
King County
130 Nickerson Street, Suite 200
Seattle, Washington 98109-1658

RE: Slug Discharge Control Plan Submittal

Ms. Eng,

Please find the enclosed slug discharge control plans for the Alaskan Copper Works South 6th Avenue and East Marginal Way facilities.

We believe these plans will provide the county with updated and accurate information pertaining to both operations. Please be advised that the East Marginal Way operation has been suspended and there are no current wastewater discharges from pre-treatment processing as described in the plan. This may change in the future and we will advise King County accordingly.

Please feel free to contact me should you have any questions regarding the submitted plans.

Thank you for your assistance with the plan development process.

Sincerely,

Matthew Dunn
ROMIC
(b) (6)
matthewd@romic.com

ALASKAN COPPER WORKS
SPILL/SLUG DISCHARGE CONTROL PLAN

For

Alaskan Copper Works Facility
3600 East Marginal Way
Seattle, Washington 98134

Contents

Plan produced by;

ROMIC Environmental Technologies, Corp
14434 SE Industrial Way
Clackamas, Oregon 97124
503-785-0404

October 16, 2006

ALASKAN COPPER WORKS
SPILL/SLUG DISCHARGE CONTROL PLAN

For

Alaskan Copper Works Facility
3600 East Marginal Way
Seattle, Washington 98134

Under the requirements of 40CFR 403.8 (f)(2)(vi) his plan augments the Alaskan Copper Works Industrial Wastewater Discharge Permit; Spill Prevention, Control and Countermeasures Plan (SPCC) and applicable King County industrial pre-treatment discharge requirements.

A copy of this plan and successive updates to this plan are to be submitted to:

King County
Wastewater Treatment Division
Industrial Waste Program
130 Nickerson Street, Suite 200
Seattle, Washington 98109-1658

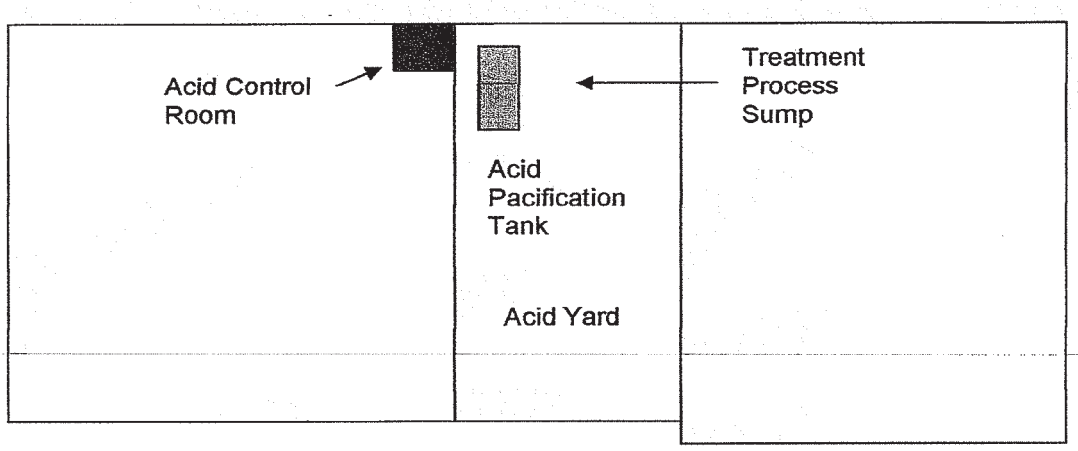
Section 1 General Information

Industrial User:	Alaska Copper Works
Industrial User Address:	3600 East Marginal Way Seattle, Washington 98134
Industrial User Discharge Permit Number	WAR00139 PSAPCA 16300
Primary facility contact with 24hour phone number:	Jim Brown Office (206) 623-5800 Cell (b) (6)
Secondary facility contact number	Gerald Thompson Office (206) 623-5800 Home (b) (6)
Nature of Business	Pacification of fabricated stainless steel pipe and fittings
Operating Hours	Monday through Friday
Number of Employees	Estimated 30- 45 days/year

Section 2 Alaskan Copper Works Facility Layout

Product Production Layout

East Marginal Way

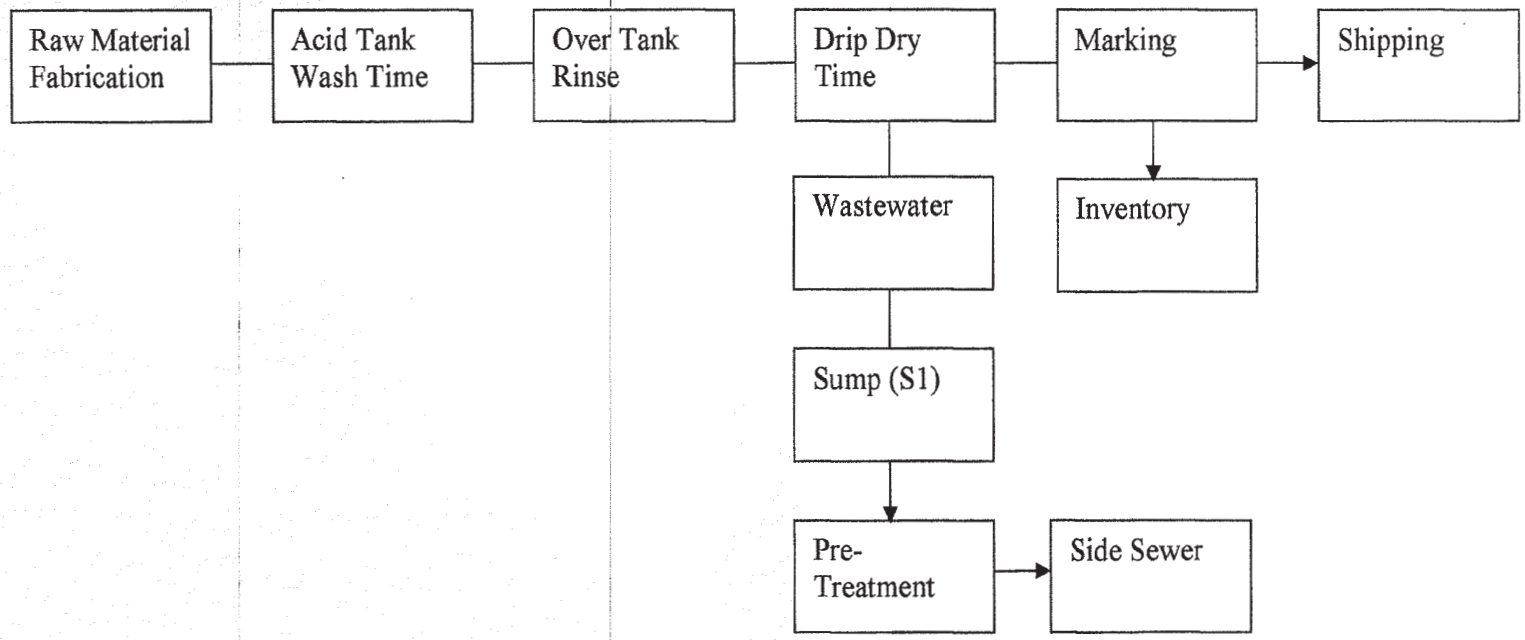


3600 East Marginal Way
44,610 square feet

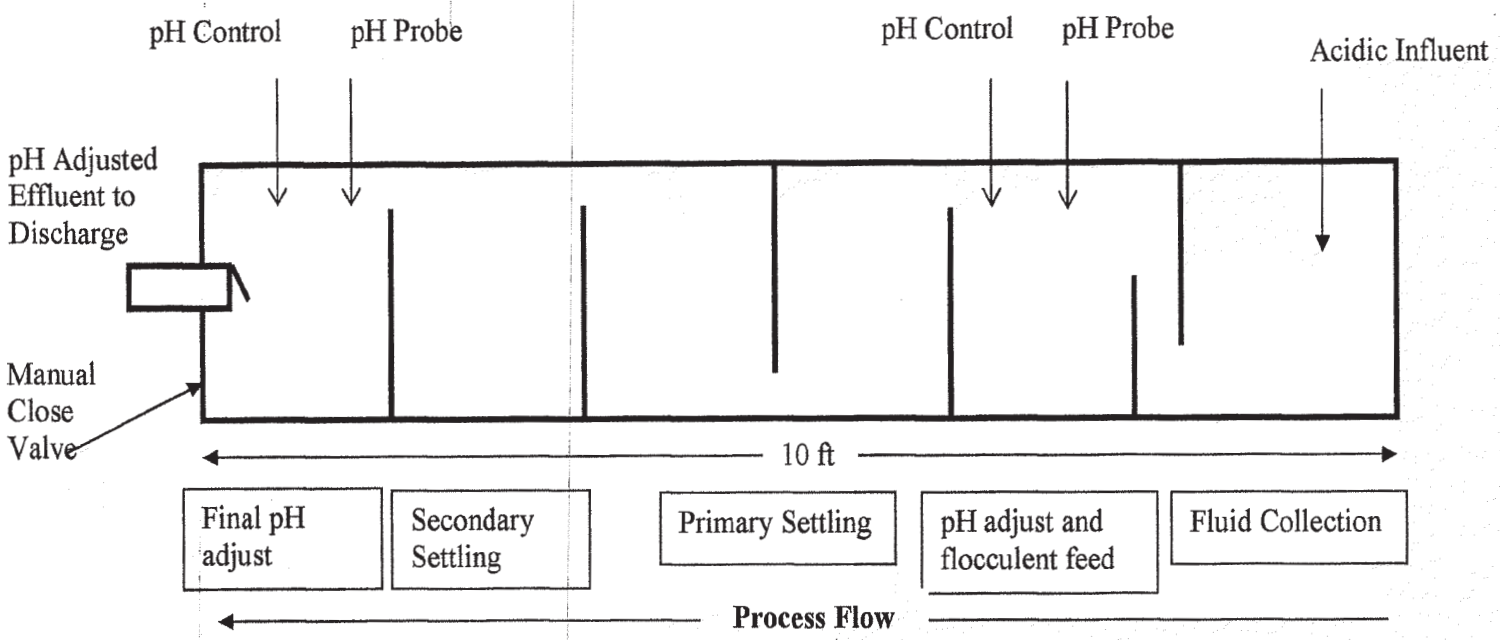
N

Not to Scale

Chemical Pacification Process and Wastewater Pre-Treatment Flow Chart



Wastewater Treatment Process Flow



Section 3 Alaskan Copper Works Inventories

Inventory of Process and Wastewater Pre-Treatment Tanks

Process Tank or System	Size	Building Location	Chemical and Concentration	Slug Spill Prevention Measures
Pacification Tank	3000 g	3600	Nitric Acid 10% Ammonium Bifluoride <1%	Secondary Containment 4000 gallons with no floor drains
Treatment Sump	3000 g	3600	Nitric Acid 10% Ammonium Bifluoride <1%	Secondary Containment 4000 gallons with no floor drains

Inventory of Waste Chemistries

Waste Type	Max Amount	Container	Building Location	Slug Spill Prevention Measures
Treatment Filter Cake Solids	4	275 tote	3600	Secondary Containment of 150% with no floor drains

Inventory of New Chemistries

Location	Sub Location	Material	Media	Container	Max Amount	Unit
3600	Acid Yard	Sodium Hydroxide	Liq	55 gallon	110	g
3600 Production	Acid Yard	Nitric solution 10%	Liq	5 gallon	25	g

Section 4 Description of Discharge Practices

Pacification Process Wastewater

All pacification process waste streams are collected into a process sump where sodium hydroxide is added to neutralize nitric and ammonium bifluoride acids to an optimum pH of between 8.5 and 9. A flocculent is then mixed into the pH adjusted wastewater and solids all owed to settle in one of two settling tanks. A final pH adjustment is made in a holding and prior to discharge. Settled solids are filtered in to a solid cake and disposed of off site.

Treatment system is run on a batch mode based on production conditions.

Raw chemical product to include nitric acid and sodium hydroxide are ordered based on need and received and mixed directly into bulk process tanks. Little or no chemical stock is retained or stored.

Solvent and Oily Wastes

No solvents or oils are discharged to storm drain or municipal sewage systems. All solvents and oily wastes are stored in a minimum of 110% capacity containments. (refer to Hazardous Waste Storage Layout Diagram)

Section 5 Procedures for Notifying King County

The Alaskan Copper Works SPCC requires immediate notification to King County Wastewater Treatment Division upon verification of accidental spill or non-customary batch discharge to the city municipal system. The SPCC specifically requires facility emergency coordinator to immediately notify the Wastewater Treatment Division after confirming discharge indicating type and nature of the discharge, estimated volume and duration, and chemical or other technical and safety data that would assist in any county response action.

The emergency coordinator will investigate spill incidents involving discharges and will submit a written spill to the county within five days from date of spill.

Section 6 Inventory of Spill and Leak Prevention Equipment

Standard spill and leak prevention equipment in addition to engineered containment systems and pumping equipment includes the following

Equipment Type	Location
Absorbent material	3600 Acid yard and pacification, waste treatment
Fire extinguishers	3600 Acid yard and pacification, waste treatment
Walkie Talkie/Cell Phone/Pager	3600 Acid yard and pacification/waste treatment Emergency Coordinator/Environmental manager
PA System	All facility areas

Section 7 Operational and Preventative Maintenance Measures

As part of the SPCC the Alaskan Copper Works Emergency Coordinator is responsible for all prevention planning and readiness activities to include

1. Assessing and monitoring chemical hazards and potential for release or introduction to stormwater or sanitary receptors
2. Updating the facility SPCC plan
3. Ensuring that all required emergency response equipment is present and in good working order
4. Coordinate training of personnel who handle hazardous chemicals at the facility
5. Implementation and enforcement of servicing and repair requests and regular maintenance schedules for hazardous chemical equipment
6. Conduct regular inspections of containment high level alarms

Section 8 Employee Safety and Training Program

The Alaskan Copper Works Health and Safety Program requires all employees having potential exposure to hazardous materials and wastes to undergo the following safety training

Training Category	Frequency	Documentation
Hazard Communication	At initial employment Change in regulation Change in chemical use When in the opinion of the EC additional refresher training is warranted	Attendance Log

Section 9 Historical Slug or Spill Discharges

Based on review of available private or public records there are no past reportable incidents, non-routine, or uncontrolled slug or spill discharges occurring at this facility

Section 10 Acknowledgement

As agent, I have been authorized to sign on behalf of Alaskan Copper Works and hereby verify that to the best of my knowledge above information contained in this plan is true and accurate.

General inquiries regarding this plan should be direct to Matthew Dunn of ROMIC at (b) (6) (b) (6)

Matthew Dunn Date
ROMIC Environmental Technologies *(on behalf of Alaskan Copper Works)*

ALASKAN COPPER WORKS
SPILL/SLUG DISCHARGE CONTROL PLAN

For

Alaskan Copper Works Facility
3200 6th Avenue S
Seattle, Washington 98134

Contents

Plan produced by;

ROMIC Environmental Technologies, Corp
14434 SE Industrial Way
Clackamas, Oregon 97124
503-785-0404

October 16, 2006

ALASKAN COPPER WORKS
SPILL/SLUG DISCHARGE CONTROL PLAN

For

Alaskan Copper Works Facility
3200 Sth Avenue S
Seattle, Washington 98134

Under the requirements of 40CFR 403.8 (f)(2)(vi) his plan augments the Alaskan Copper Works Industrial Wastewater Discharge Permit; Spill Prevention, Control and Countermeasures Plan (SPCC) and applicable King County industrial pre-treatment discharge requirements.

A copy of this plan and successive updates to this plan are to be submitted to:

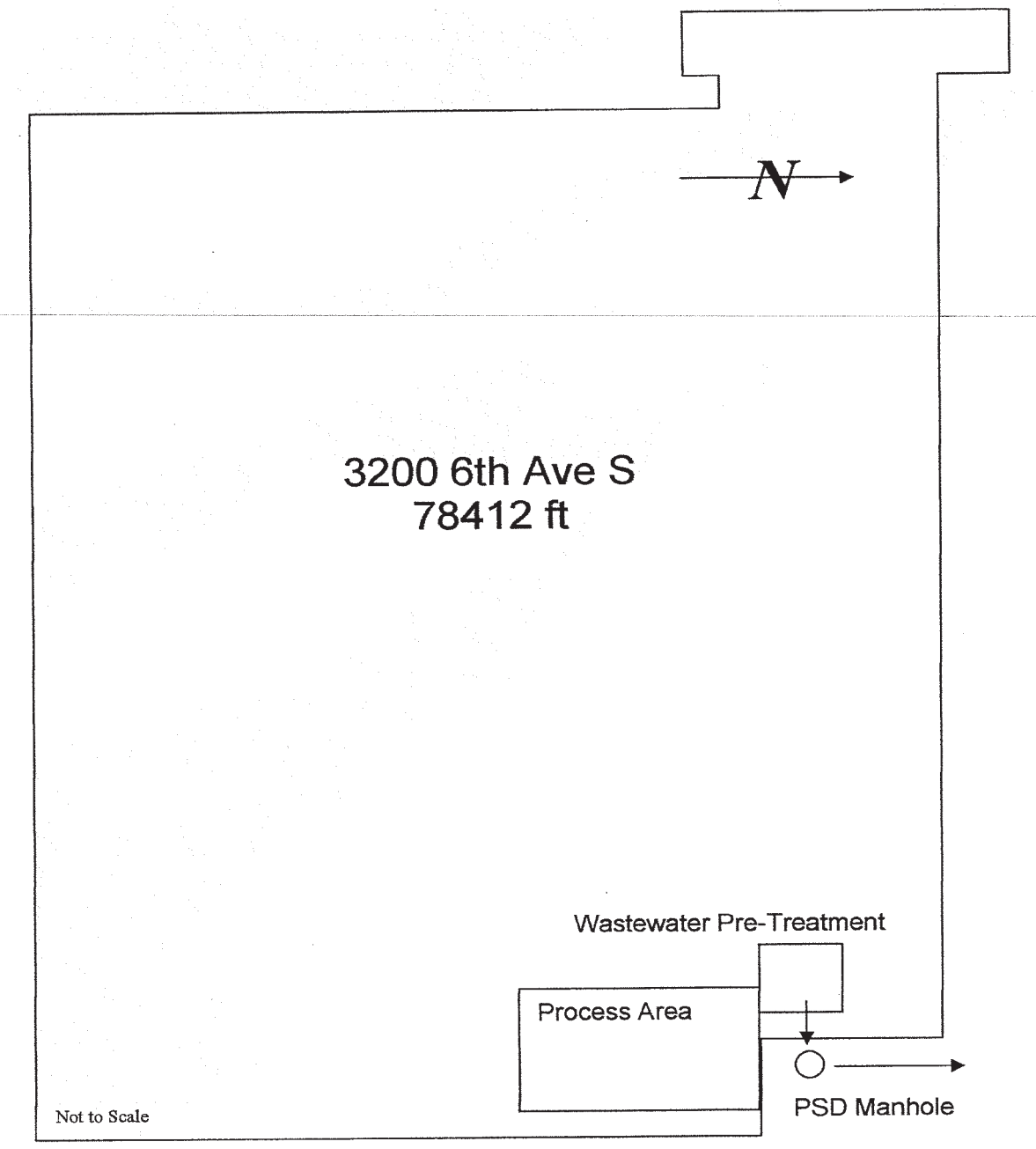
King County
Wastewater Treatment Division
Industrial Waste Program
130 Nickerson Street, Suite 200
Seattle, Washington 98109-1658

Section 1 General Information

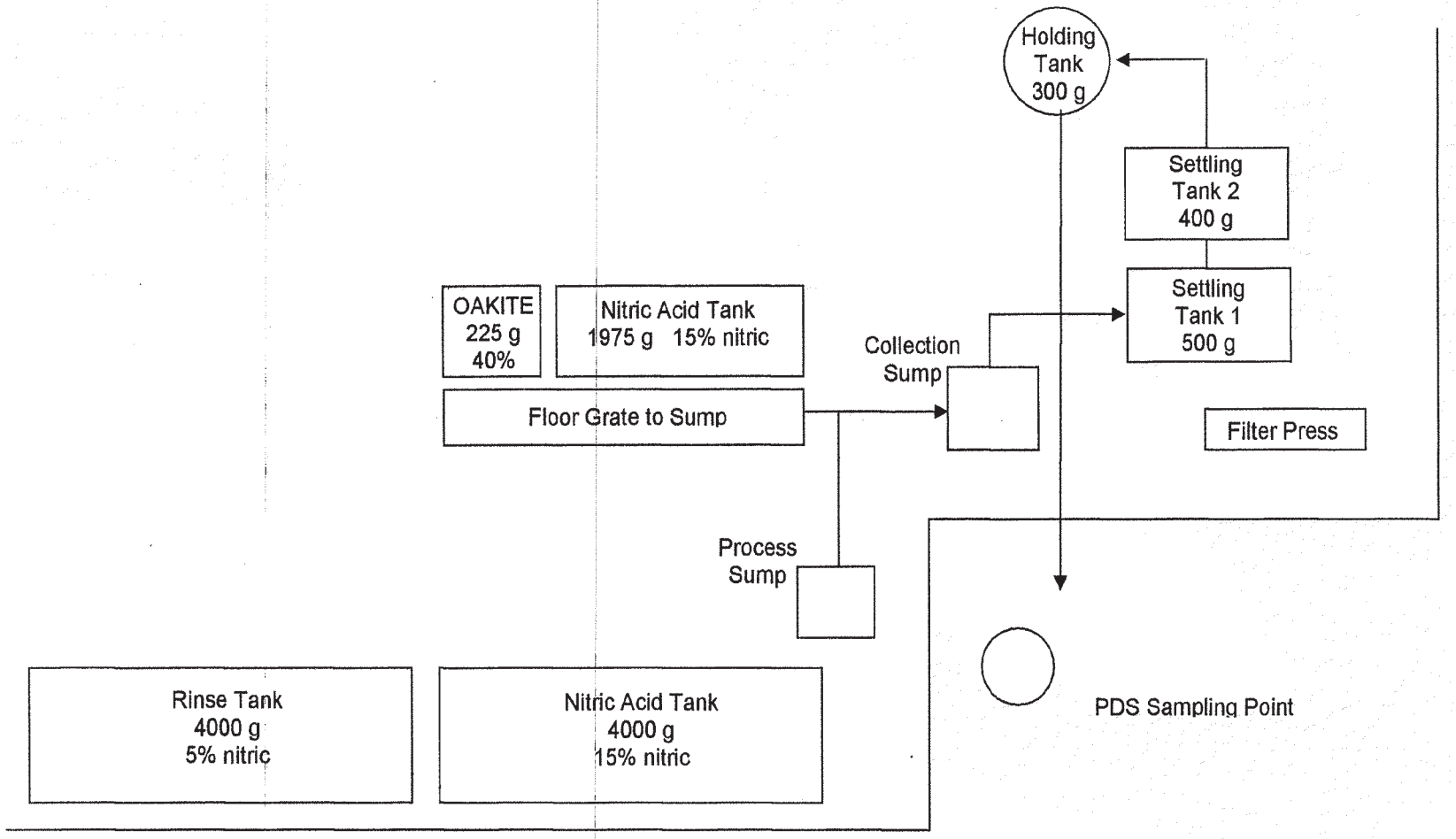
Industrial User:	Alaska Copper Works
Industrial User Address:	3200 6th Ave S. Seattle, Washington 98134
Industrial User Discharge Permit Number	WAR00139 PSAPCA 101000
Primary facility contact with 24hour phone number:	Jim Brown Office (206) 623-5800 Cell (b) (6)
Secondary facility contact number	Gerald Thompson Office (206) 623-5800 Home (b) (6)
Nature of Business	Full service and manufacturer of corrosion resistant alloy products
Operating Hours	Monday through Friday day and night shift with occasional weekend activities
Number of Employees	Estimate 110 Full time hourly and managing staff

Section 2 Alaskan Copper Works Facility Layout

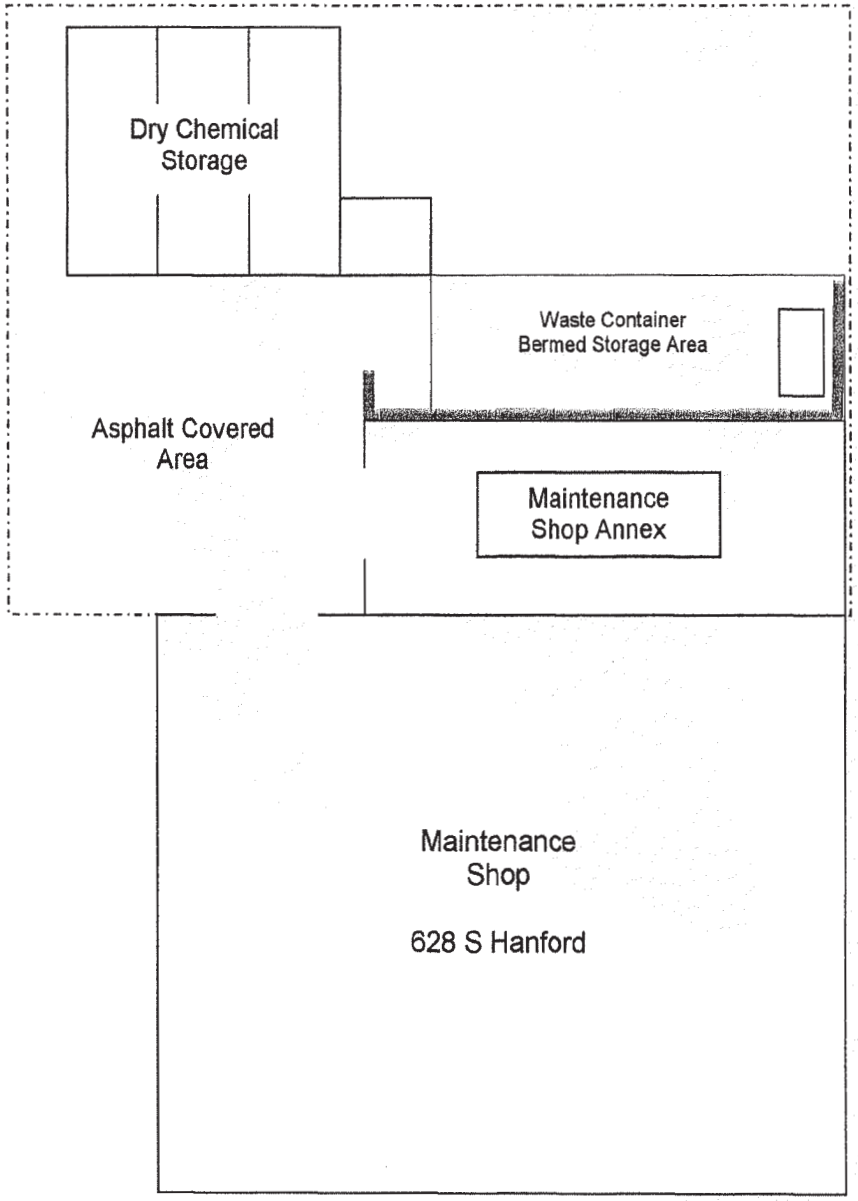
Product Production Layout



Chemical Pacification Process and Wastewater Pre-Treatment Layout



Dry Treatment Chemical and Waste Storage Layout



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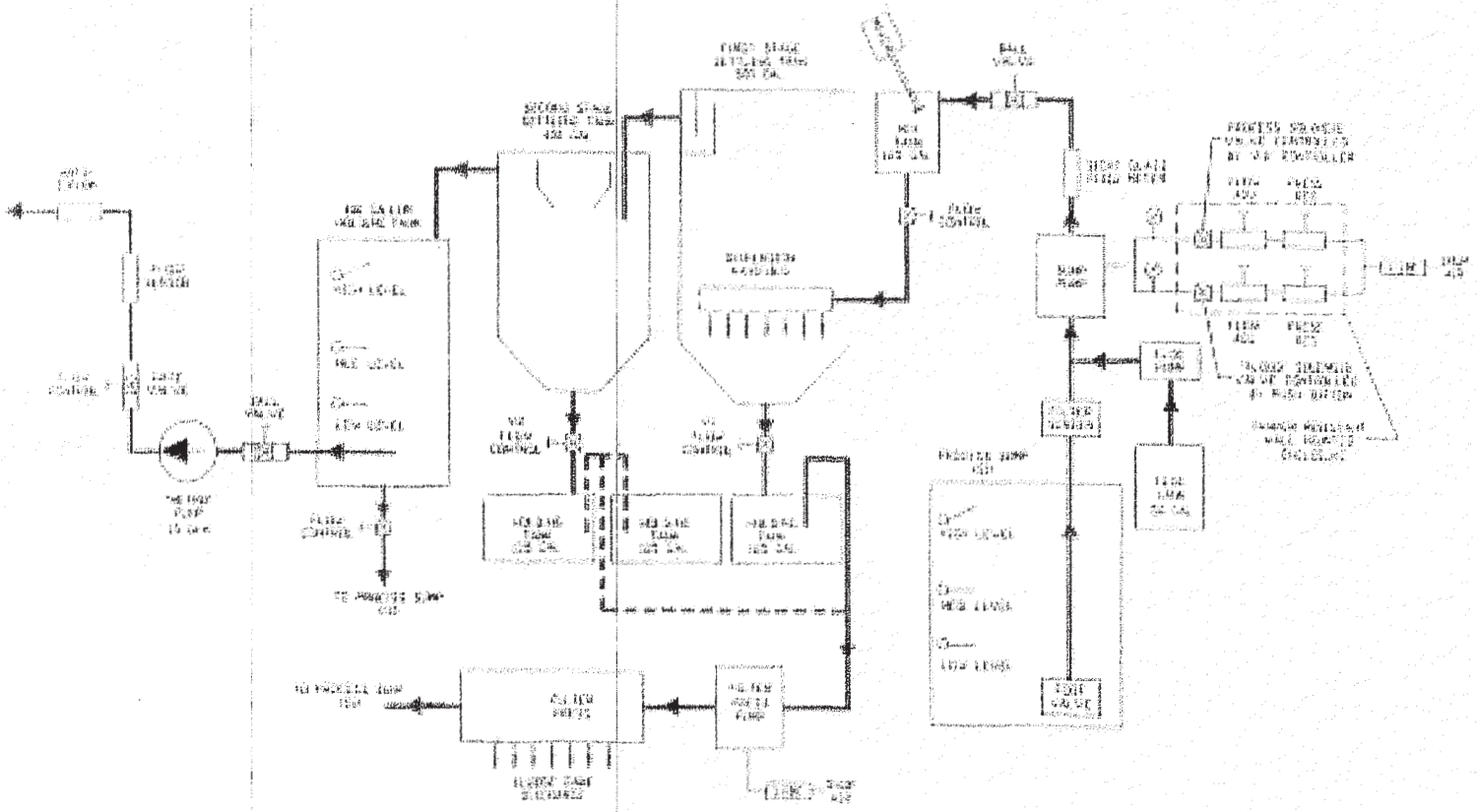
Not to Scale

Wastewater Treatment Process Flow



Section 3 Alaskan Copper Works Inventories

Inventory of Process and Wastewater Pre-Treatment Tanks

Process Tank or System	Size	Building Location	Chemical and Concentration	Slug Spill Prevention Measures
Pacification Tank A	4000 g	3200	Nitric acid 15%	Secondary Containment 6000 gallons with no floor drains
Pacification Tank B	1975 g	3200	Nitric acid 15% Ammonium Bifluoride <1%	Secondary Containment 4000 gallons with no floor drains
Rinse Tank	4000 g	3200	Nitric acid 5%	Secondary Containment 6000 gallons with no floor drains
Oakite Tank	115 g	3200	Sodium hydroxide 40%	Secondary Containment 4000 gallons with no floor drains
Plasma Table	1500 g	3405	Water with <.001 chrome	Secondary Containment 2000 gallons with no floor drains
First Stage Treatment Tank	500 g	3200	Pacification wastewater	Secondary containment 1500 gallons with no floor drains
Second Stage Treatment Tank	400 g	3200	Pacification wastewater	Secondary containment 1500 gallons with no floor drains
Treatment Holding Tank	300 g	3200	Pacification wastewater	Secondary containment 1500 gallons with no floor drains

Inventory of Waste Chemistries

Waste Type	Max Amount	Container	Building Location	Slug Spill Prevention Measures
Chromium Compounds	40	55 gallon	628	Secondary Containment of 150% with no floor drains
Treatment Filter Cake Solids	10	275 tote	628	Secondary Containment of 150% with no floor drains
Waste Solvent and Used Oil	10	55 gallon	628	Secondary Containment of 150% with no floor drains

Inventory of New Chemistries

Location	Sub Location	Material	Media	Container	Max Amount	Unit
628 Maintanence	Shop	Acetone	Liq	VAR	30	g
3200 Production	Tool/Supply Room Area	Acetone	Liq	VAR	55	g
3405 Fab	Production Area	Acetone	Liq	VAR	55	g
TOTAL					**140**	**g**
3200 Production	Gas Pad	Acetylene	Gas	VAR	5000	p
3317 Plasma	Plasma Gas Storage	Acetylene	Gas	VAR	1000	p
3405 Fab	Production Area	Acetylene	Gas	VAR	5000	p
3405 Fab	Outside Gas Storage	Acetylene	Gas	VAR	1000	p
TOTAL					**12000**	**p**
3200 Production	Gas Pad	Argon	Gas	VAR	10000	p
3317 Plasma	Plasma Gas Storage	Argon	Gas	VAR	1500	p
3405 Fab	Outside Gas Storage	Argon	Gas	VAR	1000	p
3200 Production	Gas Pad	Argon	Gas	VAR	3000	p
TOTAL					**15500**	**p**
3200 Production	Gas Pad	Carbon Dioxide	Gas	VAR	1000	p
3223 Warehouse	Rack Storage	Cutting Fluid	Liq	VAR	500	g
3317 Plasma	Plasma Gas Storage	Ethylene Glycol	Liq	VAR	110	g
3200 Production	Gas Pad	Helium	Gas	VAR	5000	p
3317 Plasma	Plasma Gas Storage	Helium	Gas	VAR	2000	p
3405 Fab	Outside Gas Storage	Helium	Gas	VAR	1000	p
TOTAL					**8000**	**p**
3317 Plasma	Plasma Gas Storage	Hydrogen	Gas	VAR	1500	p
3405 Fab	Outside Gas Storage	Hydrogen	Gas	VAR	1000	p
3200 Production	Gas Pad	Hyrdrogen	Gas	VAR	1000	p
TOTAL					**3500**	**p**
3200 Production	Gas Pad	Methyl Propylene	Gas	VAR	1000	p
3200 Production	Acid Yard	Nitric acid	Liq	VAR	6000	g
3200 Production	Gas Pad	Nitrogen	Gas	VAR	5000	p
3317 Plasma	Plasma Gas Storage	Nitrogen	Gas	VAR	2000	p
3405 Fab	Production Area	Nitrogen	Gas	ONE	1000	p
3405 Fab	Outside Gas Storage	Nitrogen	Gas	VAR	1000	p
TOTAL					**9000**	**p**
3200 Production	Tool/Supply Room Area	Oil/Unused	Liq	VAR	110	g
3200 Production	Die Cast	Oxygen	Gas	VAR	300	p

3200 Production	Production	Oxygen	Gas	VAR	800	p
3200 Production	Gas Pad	Oxygen	Gas	VAR	4000	p
3317 Plasma	Plasma Gas Storage	Oxygen	Gas	VAR	500	p
3405 Fab	Outside Gas Storage	Oxygen	Gas	VAR	2000	p
3405 Fab	Production Area	Oxygen	Gas	VAR	5000	p
TOTAL					**12600**	**p**
3200 Production	Rack Storage	Paint Spray	Liq	VAR	25	g
3405 Fab	Production Area	Paint Spray	Liq	VAR	55	g
3200 Production	Tool/Supply Room Area	Paint/Spray	Liq	VAR	55	g
TOTAL					**135**	**g**
628 Maintanence	Shop	Petroleum Napthalene	Liq	ONE	30	g
3200 Production	Tool/Supply Room Area	Petroleum Napthalene	Liq	ONE	30	g
3200 Production	Line Mark	Petroleum Napthalene	Liq	ONE	1	g
TOTAL					**61**	**g**
3200 Production	Line Mark	Propane	Gas	ONE	3000	p
3405 Fab	Production Area	Propane	Gas	VAR	1000	p
TOTAL						
3200 Production	Acid Yard	Sodium hydroxide	Sol	ONE	400	p
3405 Fab	Production Area	Wood Resin/Pitch	Liq	ONE	5000	p
3405 Fab	Production Area	Xylene	Liq	VAR	55	g
3405 Fab	West Side	Diesel (Fuel Oil 2)	Liq	ONE	600	g

Section 4 Description of Discharge Practices

Pacification Process Wastewater

All pacification process waste streams are collected into process sumps and pumped to a central neutralization sump where sodium hydroxide is added to neutralize nitric and ammonium bifluoride acids to an optimum pH of between 8.5 and 9. A flocculent is then mixed into the pH adjusted wastewater and solids all owed to settle in one of two settling tanks. A final pH adjustment is made in a holding and prior to discharge. Settled solids are filtered in to a solid cake and disposed of off site.

Treatment system can be run on continuous or batch mode depending on production conditions.

Raw chemical product to include nitric acid and sodium hydroxide are ordered based on need and received and mixed directly into bulk process tanks. Little or no chemical stock is retained or stored.

Cutting Table (Plasma) Waste

Metal slag and water is vacuumed out of the cutting table during scheduled shut downs and containerized into 55 gallon drums. Water from the drums is decanted manually in a contained asphalt covered area. The water is added to the pacification wastestream prior to pre-treatment and discharge.

All dewatered solids are shipped off site to a licensed EPA recycler

Solvent and Oily Wastes

No solvents or oils are discharged to storm drain or municipal sewage systems. All solvents and oily wastes are stored in a minimum of 110% capacity containments. (refer to Hazardous Waste Storage Layout Diagram)

Section 5 Procedures for Notifying King County

The Alaskan Copper Works SPCC requires immediate notification to King County Wastewater Treatment Division upon verification of accidental spill or non-customary batch discharge to the city municipal system. The SPCC specifically requires facility emergency coordinator to immediately notify the Wastewater Treatment Division after confirming discharge indicating type and nature of the discharge, estimated volume and duration, and chemical or other technical and safety data that would assist in any county response action.

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Section 6 Inventory of Spill and Leak Prevention Equipment

Standard spill and leak prevention equipment in addition to engineered containment systems and pumping equipment includes the following

Equipment Type	Location
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Walkie Talkie/Cell Phone/Pager	3200 Acid yard and pacification/waste treatment Emergency Coordinator/Environmental manager
PA System	All facility areas

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Section 9 Historical Slug or Spill Discharges

Based on review of available private or public records there are no past reportable incidents, non-routine, or uncontrolled slug or spill discharges occurring at this facility

Section 10 Acknowledgement

As agent, I have been authorized to sign on behalf of Alaskan Copper Works and hereby verify that to the best of my knowledge above information contained in this plan is true and accurate.

General inquiries regarding this plan should be direct to Matthew Dunn of ROMIC at (b) (6) (b) (6)

Matthew Dunn Date
ROMIC Environmental Technologies *(on behalf of Alaskan Copper Works)*

King County
Wastewater Treatment Division
Industrial Waste Program
Department of Natural Resources and Parks
130 Nickerson Street, Suite 200
Seattle, WA 98109-1658
206-263-3000
206-263-3001 Fax

FAX TRANSMITTAL MEMO

TO: Sidney @ Lonnie
DEPT: FAX #: 253-286-0579
FROM: JBrown PHONE: (b) (6)
CO: ACEB FAX #:
Post-it brand fax transmittal memo 7671 NO. OF PAGES 4

July 13, 2006

James C. Brown
Alaskan Copper Works - 6th Ave.
P.O. Box 3546
Seattle, WA 98124

EPA Pretreatment Streamlining Rule – Slug Discharge Control Plan Submittal Requirement

Dear Mr. Brown:

On October 14, 2005, the Environmental Protection Agency (EPA) published the Pretreatment Streamlining Final Rule in the Federal Register. The Streamlining Rule amends eleven sections of the EPA's General Pretreatment Rules detailed in 40 CFR 403 of the Federal Register. The Pretreatment Streamlining Final Rule can be read in its entirety at www.epa.gov/npdes/regulations/streamlining_fr_notice.pdf.

One of the amended sections deals with requirements associated with submittal of a Slug Discharge Control Plan (SDCP). 40 CFR 403.8(f)(2)(vi) of the pretreatment streamlining amendments requires that permitting authorities such as King County evaluate, by October 15, 2006, whether each permitted facility *needs a plan* [Slug Discharge Control Plan] *and/or take other related actions to control Slug Discharges.*

In 40 CFR 403.8(f)(2)(vi), EPA defines a "Slug Discharge" as *any discharge of a non-routine, episodic nature, including but not limited to, an accidental spill or a non-customary batch discharge, which has a reasonable potential to cause Interference or Pass Through, or in any way violate the POTW's regulations, local limits, or Permit conditions.*

40 CFR 403.8(f)(2)(vi) lists the minimum elements that should be included in the Slug Discharge Control Plan. EPA's *Control of Slug Loadings to POTW's* Guidance Document (pages 149-167) published in 1991 also includes examples of Slug Discharge Control Plans: www.epa.gov/npdes/pubs/owm021.pdf.

In response to the new slug discharge control plan standards established by EPA, King County evaluated the nature of your operation and your facility's Spill Prevention and Containment Plan submitted with your most recent permit application. We have determined that your facility's Spill Prevention and Containment Plan may need to be revised to include all slug discharge control elements listed by the EPA.

Please review and revise your current facility Slug/Spill Discharge Control Plan and submit the updated version to King County. At a minimum, your plan should include the following elements:

1. General Company Information:
   - Company name
   - Address
   - Contact person(s)
   - Phone number(s)
   - Emergency 24-hour phone number(s)
   - Operating schedule (days of week and hours)
   - Describe nature of business
2. Facility Layout Flow Diagrams (the information submitted with your King County Industrial Waste permit application can be attached to this plan.) Please attach this information to this form.
3. Inventory of process tanks and new and waste chemicals stored on site. (Include location, chemicals and concentration, average stored volume, total container volume, and special provisions taken to prevent slug discharge).
4. Description of discharge practices, including non-routine batch discharges.
5. Procedures for immediately notifying King County of spills and/or slug discharges and for follow-up written notification within five days.
6. Inventory of spill and leak prevention equipment.
7. Operation and preventative maintenance measures used to prevent a spill or slug discharge.
8. Employee Safety and Training Program content and schedule.
9. Description of previous slug or spill discharge that has occurred at your facility and corrective actions implemented to prevent recurrence.

Some of this information may have been submitted to King County with your last permit application package. Feel free to call me if you need a copy of any of those documents.

Please submit your facility's revised Slug/Spill Discharge Control Plan to King County by no later than October 15, 2006.

If you have any questions regarding this letter, please feel free to call me at 206-263-3017.

Sincerely,

Lydia Eng

Lydia Eng
Investigator
Industrial Waste Program